REMARKS

Claims 1 and 3-20 are pending in this application. By this amendment, claims 1, 3-5, 9, 12-13, 16, and 19-20 are amended. For the reasons set forth below, Applicant respectfully requests reconsideration and immediate allowance of this application.

Claim Rejections Under 35 U.S.C. §103 Over Neufeld, Powderly, and Hoese

Claims 1 and 3-20 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0226015 to Neufeld et al. (hereinafter "Neufeld"), in view of U.S. Patent No. 6,560,641 to Powderly et al. (hereinafter "Powderly"), and in further in view of U.S. Patent Application Publication No. 2004/0054838 to Hoese et al. (hereinafter "Hoese"). This rejection is respectfully traversed.

I. Claims 1 and 3-8 are allowable.

As amended, claim 1 recites, *inter alia*, that a method for communicating with a computer management device comprises transmitting the one or more vendor specific commands from an application programming interface of the host computer to the device emulated at the computer management device over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard; receiving the one or more vendor specific commands at the computer management device; determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the

remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

Neufeld does not teach, suggest, or describe a method for communicating with a computer management device including the features recited by claim 1. On the contrary, Neufeld describes a method for accessing, interacting, and monitoring a managed server from a remote console including providing a remote management controller on a PCI bus of the managed server; snooping, at the remote management controller, the PCI bus for configuration transactions between a processor and a video graphics controller of the managed server; and routing keystrokes to a keyboard controller of the managed server from the remote console. Neufeld describes that the PCI bus of the managed system is the main communication interface between the managed server and the remote management controller. Neufeld further describes that the remote management controller includes a USB interface connected to one port of a USB controller typically located in a south bridge portion of the managed server and that the remote management controller may emulate a USB device, such as a USB floppy drive or USB CD drive, that allows the remote management controller to mount additional storage volumes to the managed server residing on an application such as a remote management console.

This is not analogous to the method recited by claim 1 because Neufeld fails to teach, suggest, or describe transmitting the one or more vendor specific commands from an application programming interface of the host computer to the device emulated at the computer management device over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard. Instead, Neufeld describes that the managed server transfers data between a processor of the managed server and a video graphics controller of the managed server over a PCI bus of the managed server and that the remote management controller snoops the data sent by the processor of the managed server to the video graphics controller of the managed server, without teaching, suggesting, or describing that the managed server includes an application programming interface that transmits a vendor specific command to a device emulated by the remote management controller, which is what the Office Action appears to equate with the computer management device, over a communication link between the managed server and the remote management controller. Neufeld describes that the remote management controller may emulate a USB device but fails to teach, suggest, or describe that an application programming interface of the managed

server transmits any commands to the USB device emulated by the remote management controller.

The Office Action points to paragraph [0017] of Neufeld as allegedly teaching transmitting the one or more vendor specific commands from an application programming interface of the host computer to the device emulated at the computer management device over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard as recited by claim 1. Applicant respectfully disagrees with this assertion. Paragraph [0017] of Neufeld is reproduced below:

> [0017] In a typical remote management system, a user (typically, a member of the network management team) can initiate an out-of-band session with the dedicated server management computer hosted in the managed server via a remote console application program being executed on a client computer. The management computer could be addressed by the user to control various aspects of the operation of the managed server via control circuitry connected to the embedded server management computer hosted by the managed server.

As indicated above, paragraph [0017] of Neufeld describes initiating an out-of-band session with a dedicated server management computer hosted in a managed server via a remote console application program being executed on a client computer. This is not analogous to the method recited by claim 1 because Neufeld fails to teach, suggest, or describe transmitting the one or more vendor specific commands *from an application programming interface of the host computer to the device emulated at the computer management device* over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard. Paragraph [0017] describes initiating an out-of-band session between *a remote console application program executing on a client computer* and *a dedicated server management computer hosted in the managed server*, without teaching, suggesting, or describing transmitting anything from an application programming interface of the managed server to an emulated device at a computer management device over a communications link between the managed server and a management device.

The Office Action appears to rely on the teachings of Powderly to cure, allegedly, the above-identified deficiencies of Neufeld. However, like Neufeld, Powderly does not teach, suggest, or describe a method for communicating with a computer management device including the features recited by claim 1. Instead, Powderly describes a method for providing, via a network, emulation of a console of a host computer system on another, remotely located computer system including providing an adapter card connected to an input/output (I/O) bus of a host computer system where the adapter card comprises a peripheral device interface controller to which peripheral devices can be connected and through which the host computer system can access the peripheral devices. This is not analogous to the method recited by claim 1 because Powderly fails to teach, suggest, or describe transmitting the one or more vendor specific commands *from an application programming interface of the host computer to the device emulated at the computer management device* over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard.

The Office Action points to col. 2, lines 42-52 of Powderly as allegedly teaching transmitting the one or more vendor specific commands from an application programming interface of the host computer to the device emulated at the computer management device over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard as recited by claim 1. Applicant respectfully disagrees with this assertion. Col. 2, lines 42-52 of Powderly is reproduced below:

> The adapter card comprises a processor, a network interface controller providing a connection to the network, a peripheral device interface controller to which the peripheral device is connected, a communications client program executing on the processor, and at least one computer-readable medium having stored therein a modified BIOS extension for said peripheral device interface controller. The modified BIOS extension comprises first program code and second program code, the second program code being embedded within the first program code and defining a separate server program. Upon selection by a user at the

Applicant respectfully asserts that nowhere in col. 2, lines 42-52 of Powderly does Powderly teach, suggest, or describe transmitting the one or more vendor specific commands *from an application programming interface of the host computer to the device emulated at the computer management device* over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard. In fact, Powderly fails to teach, suggest, or describe an emulated device as recited by claim 1. Therefore, Powderly fails to cure the above-identified deficiencies of Neufeld. Accordingly, claim 1 is allowable over the combined teachings of Neufeld and Powderly.

Further, Neufeld fails to teach, suggest, or describe receiving the one or more vendor specific commands at the computer management device; determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device as recited by claim 1.

As noted above, Neufeld does not teach, suggest, or describe transmitting the one or more vendor specific commands from an application programming interface of the host computer to the device emulated at the computer management device over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard as recited by claim 1. It follows, then, that Neufeld also fails to teach, suggest, or describe receiving the one or more vendor specific commands at the computer management device; determining, at the computer management device, whether the

one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

Although Neufeld describes that the remote management controller may emulate a USB device, such as a USB floppy drive or USB CD drive, that allows the remote management controller to mount additional storage volumes to the managed server residing on an application such as a remote management console, nowhere does Neufeld teach, suggest, or describe determining, at the remote management controller, whether one or more vendor specific commands from an application programming interface of the managed server are commands intended for accessing data on the device emulated by the remote management controller, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

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The Office Action appears to rely on the teachings of Powderly to cure, allegedly, the deficiencies of Neufeld. However, like Neufeld, Powderly fails to teach, suggest, or describe receiving the one or more vendor specific commands at the computer management device; determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device as recited by claim 1.

As noted above, Powderly does not teach, suggest, or describe transmitting the one or more vendor specific commands from an application programming interface of the host computer to the device emulated at the computer management device over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard as recited by claim 1. It follows, then, that Powder also fails to teach, suggest, or describe receiving the one or more vendor specific commands at the computer management device; determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to

determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device as recited by claim 1.

On the contrary, Powderly describes providing a peripheral device interface controller to which peripheral devices can be connected and through which a host computer system can access the peripheral devices. However, as discussed above, the peripheral device described in Powderly is not an emulated device as recited in claim 1. Further, nowhere does Powderly teach, suggest, or describe receiving the one or more vendor specific commands at the computer management device; determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device as recited by claim 1.

The Office Action also appears to rely on the teachings of Hoese to cure, allegedly, the above-identified deficiencies of the combined teachings of Neufeld and Powderly. However, like Neufeld and Powderly, Hoese fails to teach, suggest, or describe a method for communicating with a computer management device including the features recited by claim 1. In contrast, Hoese describes a method for providing virtual local storage on remote SCSI storage devices to Fibre Channel devices including providing a storage router which supplies routing such that workstations on Fibre Channel can access storage devices on a SCSI bus such the storage devices appear to the workstations to be local storage. Hoese further describes that the

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storage router can pass all generic FCP and SCSI commands through to address attached devices while processing management commands intended for the storage router.

This is not analogous to the method recited by claim 1 because Hoese fails to teach, suggest, or describe transmitting the one or more vendor specific commands from an application programming interface of the host computer to the device emulated at the computer management device over a communications link between the host computer and the computer management device, the communications link conforming to the second communication standard; receiving the one or more vendor specific commands at the computer management device; determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

In particular, the storage router described by Hoese is not a computer management device as recited by claim 1 and does not emulate a device as recited by claim 1. It follows, then, that Hoese fails to teach, suggest, or describe determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for

communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

Further, Hoese describes that the storage router passes some commands through to attached devices and processes other commands, without teaching, suggesting, or describing determining, at the computer management device, whether the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

For at least the above reasons, claim 1 is allowable over the combined teachings of Neufeld, Powderly, and Hoese. Since claims 3-8 depend from claim 1 and recite additional features, Applicant respectfully asserts that claims 3-8 are also allowable over the combined teachings of Neufeld, Powderly, and Hoese. Accordingly, withdrawal of the rejections is respectfully requested.

II. Claims 9-15 are allowable.

As amended, claim 9 recites, *inter alia*, that a method for communicating with a computer management device comprises receiving at the computer management device, from an application programming interface of the host computer, one or more vendor specific commands directed toward the mass storage device, the vendor specific commands conforming to a second

communication standard and transmitted to the computer management device over the communication link conforming to the first standard; determining, at the computer management device, whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

 For reasons similar to those provided above regarding claim 1, claim 9 is allowable over the combined teachings of Neufeld, Powderly, and Hoese. In particular, neither Neufeld, Powderly, nor Hoese teaches, suggests, or describes a method for communicating with a computer management device comprising receiving at the computer management device, from an application programming interface of the host computer, one or more vendor specific commands directed toward the mass storage device, the vendor specific commands conforming to a second communication standard and transmitted to the computer management device over the communication link conforming to the first standard; determining, at the computer management device, whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, commands for modifying configuration data associated with the computer management device, or commands for obtaining coordinates of a user input cursor on the remote computer; in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the computer management device or commands for obtaining coordinates of a user input cursor on the remote computer, utilizing the received vendor specific commands for communicating with the computer management device; and in

response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the computer management device, accessing content from a mass storage device attached to the remote computer, the content from the mass storage device attached to the remote computer redirected from the remote computer to the computer management device.

For at least the reasons given above, claim 9 is allowable over the combined teachings of Neufeld, Powderly, and Hoese. Since claims 10-15 depend from claim 9 and recite additional features, Applicant respectfully asserts that claims 10-15 are also allowable over the combined teachings of Neufeld, Powderly, and Hoese. Accordingly, withdrawal of the rejections is respectfully requested.

III. Claims 16-20 are allowable.

As amended, claim 16 recites, *inter alia*, that a system for managing a host computer comprises the host computer supporting a communication link that conforms to a first communication standard and including an application programming interface, the application programming interface of the host computer operative to transmit one or more vendor specific commands that conform to a second communication standard over the communication link; and a management device for managing the host computer, the management device connected to the host computer via the communication link, the management device operative to emulate a mass storage device on the communication link, receive the vendor specific commands from the application programming interface of the host computer directed toward the mass storage device, determine whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer, utilize the received vendor specific commands for communicating with the management device in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the management device or commands for obtaining coordinates of a user input cursor on the remote computer, and access content from a mass storage device attached to the remote computer in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management

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device, the content from the mass storage device attached to the remote computer redirected from the remote computer to the management device.

For reasons similar to those provided above regarding claim 1, claim 16 is allowable over the combined teachings of Neufeld, Powderly, and Hoese. In particular, neither Neufeld, Powderly, nor Hoese teaches, suggests, or describes a system for managing a host computer comprising the host computer supporting a communication link that conforms to a first communication standard and including an application programming interface, the application programming interface of the host computer operative to transmit one or more vendor specific commands that conform to a second communication standard over the communication link; and a management device for managing the host computer, the management device connected to the host computer via the communication link, the management device operative to emulate a mass storage device on the communication link, receive the vendor specific commands from the application programming interface of the host computer directed toward the mass storage device, determine whether the received vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, commands for modifying configuration data associated with the management device, or commands for obtaining coordinates of a user input cursor on the remote computer, utilize the received vendor specific commands for communicating with the management device in response to determining that the one or more vendor specific commands are commands for modifying configuration data associated with the management device or commands for obtaining coordinates of a user input cursor on the remote computer, and access content from a mass storage device attached to the remote computer in response to determining that the one or more vendor specific commands are commands intended for accessing data on the mass storage device emulated by the management device, the content from the mass storage device attached to the remote computer redirected from the remote computer to the management device.

For at least the reasons given above, claim 16 is allowable over the combined teachings of Neufeld, Powderly, and Hoese. Since claims 17-20 depend from claim 16 and recite additional features, Applicant respectfully asserts that claims 17-20 are also allowable over the combined teachings of Neufeld, Powderly, and Hoese. Accordingly, withdrawal of the rejections is respectfully requested.

CONCLUSION

In view of the foregoing amendment and remarks, Applicant respectfully submits that all of the pending claims in the present application are in condition for allowance. Reconsideration and reexamination of the application and allowance of the claims at an early date is solicited. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact Applicant's undersigned attorney at the number below.

Respectfully submitted,

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/Jodi L. Hartman/

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